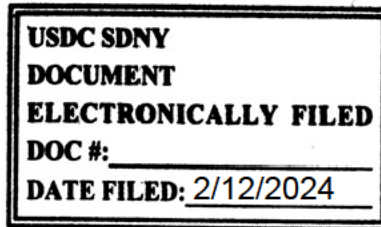


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February 9, 2024

**VIA ECF**

The Honorable Robert W. Lehrburger  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-13127

SO ORDERED:

2/12/2024

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE



**Re: AT&T Corp. v. Atos IT Solutions and Services, Inc., No. 1:21-cv-04550**

Dear Judge Lehrburger:

This firm represents Plaintiff-Counterclaim Defendant AT&T Corp. (“AT&T”). We write pursuant to Your Honor’s Rules for Redactions and Filing Under Seal to submit to the Court unredacted versions of two of AT&T’s responses (and accompanying exhibits) to the discovery letter-motions filed by Defendant-Counterclaim Plaintiff Atos IT Solutions and Services, Inc. (“Atos”).<sup>1</sup> (ECF Nos. 127, 133.)

The Court has previously issued sealing orders granting the parties’ requests to redact the identical information contained in AT&T’s letter responses and exhibits, which includes certain sensitive personal, financial and proprietary information. (See ECF Nos. 135, 139, 142, 153, 158.) AT&T’s letters and exhibits filed today contain redactions complying with the Court’s prior sealing order (ECF No. 158) permitting certain redactions in Atos’ three discovery letter-motions, as well as the Court’s direction at the November 9 hearing permitting the parties to redact the same information from the transcript. (See Nov. 9, 2023 Tr. at 78, ECF No. 109.)

Accordingly, AT&T respectfully requests that the Court permit AT&T to file the letters with exhibits in redacted form and that the redacted material be maintained by this Court under seal.

Respectfully submitted,

/s/ Christos G. Papapetrou

Christos G. Papapetrou

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<sup>1</sup> AT&T’s response (and exhibits) to Atos’ second discovery letter-motion (ECF No. 130) does not require redactions or sealing.